

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

FORD MOTOR COMPANY,

Plaintiff,

v.

MUSTANGS UNLIMITED, INC.,

Defendant.

Civil No. 99-73933

Hon. Paul D. Borman
M.J. R. Steven Whalen

Gregory D. Phillips (P80801)
Jared L. Cherry (P80800)
Phillips Winchester, LLC
4001 South 700 East, Suite 500
Salt Lake City, Utah 84107
Telephone: (801) 935-4933

Attorneys for Plaintiff

VINCENT M. AMBERLY
AMBERLY LAW
307 E. Market Street Suite 202
Leesburg, Virginia 20176
Telephone: (703) 737-3545

Attorney for Defendant

**MOTION FOR ORDER TRANSFERRING MUSTANG® DOMAIN NAMES
TO FORD PURSUANT TO ORDER TO SHOW CAUSE (ECF NO. 104)**

Pursuant to this Court's Order to Show Cause (ECF No. 104), plaintiff Ford Motor Company ("Ford") respectfully requests that this Court enter an Order transferring the domain names *mustangsunlimited.com* and *qualitymustangparts.com*, and any other domain names comprising of a Ford-owned trademark registered to Mustangs Unlimited to Ford. Ford will then be able

to submit the Order to the registrar of the domain names and effect the transfer of the domain names because registrars all have policies that require them to comply with court orders.

Ford represents to the Court that Mustangs Unlimited has failed to respond to the Order to Show Cause within thirty days, and has not transferred the domain names despite agreements to do so as set forth in the emails attached hereto as Exhibit A. As set forth in these emails, Ford has attempted in good faith to work with opposing counsel and Mustangs Unlimited to effect the transfer of the domain names without further burdening the Court.

A proposed order will be submitted via the ECF system.

Dated: May 18, 2021

By: /s/ Gregory D. Phillips

Gregory D. Phillips
Phillips Winchester, LLC
4001 South 700 East, Suite 500
Salt Lake City, Utah 84107
Telephone: (801) 935-4933

CERTIFICATE OF SERVICE

I certify that on May 18, 2021, I caused the foregoing document to be filed with the Clerk of the Court via the CM/ECF system, which will cause notice of same to be sent to all counsel of record.

By: /s/ Jared L. Cherry